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IDAHO PUBLIC UTILITIES COMMISSION 201 South Main, Suite 2300 Salt Lake City, Utah 84111

August 30, 2013

Jean D. Jewell Commission Secretary Idaho Public Utilities Commission 472 W. Washington Boise, ID 83702

Attention:

Jean D. Jewell

Commission Secretary

RE: CASE NO. PAC-E-13-04

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO INITIATE DISCUSSIONS WITH INTERESTED PARTIES ON ALTERNATIVE RATE PROPOSALS

Enclosed please find the original and nine (9) copies of the rebuttal testimony and exhibit of J. Ted Weston in support of the Stipulation that was filed on June 3, 2013.

Please contact J. Ted Weston at (801) 220-2963 if you have any further questions.

Sincerely,

Daniel E. Solander Senior Counsel

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of August, 2013, I caused to be served, via electronic mail, a true and correct copy of Rocky Mountain Power's Stipulation Testimony in PAC-E-13-04 to the following:

Ted Weston Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, UT 84111 ted.weston@pacificorp.com

Data Request Response Center PacifiCorp datarequest@pacificorp.com

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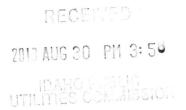
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Supervisor, Regulatory Operations



BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)
APPLICATION OF ROCKY) CASE NO. PAC-E-13-04
MOUNTAIN POWER TO INITIATE)
DISCUSSIONS WITH INTERESTED) Stipulation Rebuttal Testimony
PARTIES ON ALTERNATIVE RATE) of J. Ted Weston
PLAN PROPOSALS)
)

ROCKY MOUNTAIN POWER

CASE NO. PAC-E-13-04

1	Q.	Please state your	name, business	address, and	present	position	with	Rocky
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- 2 Mountain Power (the "Company"), a division of PacifiCorp.
- 3 A. My name is J. Ted Weston and my business address is 201 South Main, Suite
- 4 2300, Salt Lake City, Utah, 84111. I am currently employed as the Manager of
- 5 Idaho Regulatory Affairs.
- 6 Q. Are you the same J. Ted Weston who submitted stipulation testimony in this
- 7 proceeding?
- 8 A. Yes.

9 PURPOSE OF TESTIMONY

- 10 Q. What is the purpose of your rebuttal testimony in this proceeding?
- 11 A. The purpose of my testimony is to respond to the testimony filed by Community
- 12 Action Partnership of Idaho ("CAPAI") witness Ms. Christina Zamora. Although
- Ms. Zamora's testimony touches on a number of subjects that are irrelevant to this
- proceeding, I will largely limit my response to the issues germane to the
- Stipulation, and also briefly address the most egregious misstatements contained
- in her testimony regarding CAPAI's Motion to Compel and the Company's
- response to the data request that was the basis for the motion.
- 18 Q. Does Rocky Mountain Power agree with the concerns raised by CAPAI
- regarding the procedural handling of the Company's alternative rate plan
- 20 proposal?
- 21 A. No. Rocky Mountain Power strongly disagrees with CAPAI's characterization of
- the process that resulted in the Stipulation pending before this Commission. On
- 23 March 1, 2013, the Company made two filings with the Commission. In order to

preserve its right to file a general rate case, it filed a Notice of Intent to file a general rate case, and a *separate* application requesting that the Commission open and notice a case with the intent of identifying interested parties that would like to participate in alternative rate plan discussions (the "Application"). The Notice of Intent was filed to comply with Commission noticing requirements that would allow the Company to file a general rate case after May 31, 2013, in accordance with the timing agreed to in the stipulation in the Company's 2011 general rate case, Case No. PAC-E-11-12 (the "2011 GRC Stipulation"), in the event that the alternative rate plan discussions were unsuccessful. The Company filed the Application early to provide time for parties to discuss alternatives to a general rate case. It was this alternative Application that led to this proceeding and the Stipulation that is before the Commission for approval.

After the Commission noticed the Company's Application, Rocky Mountain Power worked closely over several months with the Commission staff and the other intervening parties to craft a solution that provided adequate notice to all parties, complied with Commission rules, and eliminated the need for the general rate case filing that the Company had put parties on notice of through the required Notice of Intent filing it had made. This effort was undertaken by all parties with great care and attention to proper Idaho Public Utilities Commission protocol for settlement discussions. The statements in Ms. Zamora's testimony that the Company violated the timing for filing a general rate case agreed to in the 2011 GRC Stipulation and that the current Stipulation arose out of an application filed before May 31, 2013, ignore the fundamental fact that Rocky Mountain

1	Power did not file a general rate case application, but instead worked with the
2	parties to craft an alternative that was acceptable to a broad cross-section of Idaho
3	customers and stakeholders.

- 4 Q. How does the Stipulation address the very concern that Ms. Zamora raises
 5 regarding the general trend of more frequent general rate case filings?
- A. The Stipulation eliminated the current need for a general rate case and avoids a change in base rates as a result of a general rate case until at least January 1, 2016, which means customers will enjoy at least a three-year period between general rate case rate changes. The Stipulation appears to address the very issue that Ms. Zamora is concerned about.
- 11 Q. Please respond to Ms. Zamora's allegations that Rocky Mountain Power 12 failed to respond to CAPAI's data request?

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A.

The statements in Ms. Zamora's testimony and exhibit arguing that the Company has refused or failed to provide a response to CAPAI's discovery requests are completely false. The real issue is that Ms. Zamora just didn't like the answer that was provided. The Company had not prepared the analysis that they had requested and, therefore, had nothing to give them. Rocky Mountain Power's complete response was timely provided on May 29, 2013. Later, following the filing of the Company's Response to CAPAI's Motion to Compel, Rocky Mountain Power completed an analysis responsive to the request made by CAPAI and provided it to them on August 12, 2013. A true and correct copy of the response is provided as Exhibit No. 4 to my testimony. The spreadsheet that was provided is similar to the format of similar data responses that have been provided

to CAPAI in other proceedings, including the Company's current Washington
general rate case. As noted in the response to CAPAI Data Request 6b, due to the
almost unlimited combinations for block rates and the vagueness of the question,
in order to be responsive the Company provided two rate design scenarios.
Additionally, the Company provided all data necessary so that CAPAI could
explore other rate design scenarios and bill impacts. The Company's response to
Ms. Zamora's other incorrect assertions regarding the Company's failure to
respond to CAPAI's discover request is fully contained in the Company's
Response to CAPAI's Motion to Compel, which was filed with the Commission
on August 9, 2013. ¹

- 11 Q. Does this conclude your rebuttal testimony?
- 12 A. Yes.

¹ The arguments in Ms. Zamora's testimony regarding the failure to respond seem particularly inappropriate considering the Motion to Compel was withdrawn by CAPAI on August 14, 2013.

Case No. PAC-E-13-04 Exhibit No. 4 Witness: J. Ted Weston BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION **ROCKY MOUNTAIN POWER** Exhibit Accompanying Stipulation Rebuttal Testimony of J. Ted Weston August 2013

Rocky Mountain Power Exhibit No. 4 Page 1 of 6 Case No. PAC-E-13-04 Witness: J. Ted Weston

PAC-E-13-04/Rocky Mountain Power August 12, 2013 CAPAI Data Request 6

CAPAI Data Request 6

Using the Company's low-income proxy group, and based on actual monthly test year data as referred to in Request No.4, please make the following rate design model runs:

- a. Calculate the effects on the low-income customer proxy group's monthly bills if the Company's monthly basic charge were increased from its current level to \$10, \$15 and to \$20, (assuming no changes to the existing commodity rates for the Residential class's two-tiered rate). In responding to this request, please make the requested calculations at existing rates during the test year.
- b. Assuming no change to the Company's existing monthly basic charge, calculate the effects on the low-income proxy groups' monthly bills in comparison to non-low income residential customers (using test year actual monthly consumption) if the existing two-tiered rate design is changed such that the consumption amount of the first tier is increased from the existing 700 kWh summer block to 800 kWh/month, 1000 kWh and 1200 kWh. Please provide the same data for the winter block of 1000 kWh if the block were changed to 800 kWh, 1200 kWh and 1400 kWh.

1st Supplemental Response to CAPAI Data Request 6

- a. Please refer to Attachment CAPAI DR 6a (provided on May 29, 2013) for the requested monthly bill impact analysis for the low-income customer proxy group who were under Schedule 1 in 2012.
- b. Please refer to Attachment CAPAI DR 6b 1st Supplemental for the requested monthly bill impact analysis between the low-income proxy group and non-low-income group under Schedule 1. Since there are almost unlimited combinations of 1st block and 2nd block rates for each block under a revenue-neutral scenario, the analysis provided two rate design options: Option A keeps the ratio of the requested 1st block and 2nd block rates same as the ratio of current 1st block and 2nd block rates; Option B keeps the requested 1st block rate same as the current 1st block rate. The attachment contains all necessary billing determinants that CAPAI may use to explore any other rate design scenarios and the bill impacts.

Record holder:

James Zhang

Sponsor:

Joelle Steward

Attachment CAPAI DR 6b
Rocky Mountain Power - State of Idaho
Monthly Billing Comparison - Schedule 1
Low Income Proxy Customer Average Monthly Usage
Rate Design A - Same Price Ratio between 1st and 2nd Blocks

			Monthly Billing	Billing 1			Change %	
			kW	kWh Block Scenario	io	kW	kWh Block Scenario	0
Month	kWh	Present	800	1,000	1,200	800	1,000	1,200
Jan	1,855							
Feb	1,615							
Mar	1,454							
Apr	1,046							
May	824	\$103.88	\$102.12	\$103.34	\$104.78	-1.7%	-0.5%	0.9%
Jun	713	\$86.94	\$88.23	\$90.11	\$91.35	1.5%	3.6%	5.1%
Jul	663	\$80.73	\$82.40	\$84.15	\$85.30	2.1%	4.2%	5.7%
Aug	069	\$83.81	\$85.55	\$87.37	\$88.57	2.1%	4.2%	5.7%
Sep	635	\$77.54	\$79.14	\$80.81	\$81.92	2.1%	4.2%	2.6%
Oct	989	\$83.24	\$84.97	\$86.77	\$87.96	2.1%	4.2%	5.7%
Nov	1,026							
Dec	1,416							

			Monthly Billing	Dilling			Change %	
			kW	kWh Block Scenario	oi Oi	kW	kWh Block Scenario	0
Month	kWh	Present	800	1,200	1,400	800	1,200	1,400
Jan	1,855	\$194.01	\$195.91	\$192.06	\$194.63	1.0%	-1.0%	0.3%
Feb	1,615	\$165.75	\$168.24	\$163.19	\$165.36	1.5%	-1.5%	-0.2%
Mar	1,454	\$146.80	\$149.67	\$143.82	\$145.72	2.0%	-2.0%	-0.7%
Apr	1,046	\$98.76	\$102.62	\$99.38	\$100.67	3.9%	%9.0	1.9%
May	824							
Jun	713							
Jul	693							
Aug	069							
Sep	635							
Oct	989							
Nov	1,026	\$96.40	\$100.32	\$97.58	\$98.84	4.1%	1.2%	2.5%
Dec	1,416	\$142.32	\$145.29	\$139.25	\$141.09	2.1%	-2.2%	%6.0-

¹ Includes current Schedule 34-BPA Credit, ECAM and Customer Efficiency Services Rate Adjustment.

Attachment CAPAI DR 6b
Rocky Mountain Power - State of Idaho
Monthly Billing Comparison - Schedule 1
Low Income Proxy Customer Average Monthly Usage
Rate Design B - No Price Change to the 1st Block

			Monthly Billing	Billing 1			Change %	
			kW	kWh Block Scenario	0	kW	kWh Block Scenario	0
Month	kWh	Present	800	1,000	1,200	800	1,000	1,200
Jan	1,855							
Feb	1,615							
Mar	1,454							
Apr	1,046							
May	824	\$103.88	\$100.33	\$99.10	\$99.10	-3.4%	-4.6%	-4.6%
Jun	713	\$86.94	\$86.44	\$86.44	\$86.44	-0.6%	%9 :0 -	%9 .0-
Jul	663	\$80.73	\$80.73	\$80.73	\$80.73	%0.0	%0.0	%0.0
Aug	069	\$83.81	\$83.81	\$83.81	\$83.81	0.0%	%0.0	%0.0
Sep	635	\$77.54	\$77.54	\$77.54	\$77.54	0.0%	%0.0	%0.0
Oct	685	\$83.24	\$83.24	\$83.24	\$83.24	0.0%	0.0%	%0.0
Nov	1,026							
Dec	1,416							

				Monthly Billing	Billing 1			Change %	
				kW	kWh Block Scenario	.0	kW	kWh Block Scenario	0
1	Month	kWh	Present	800	1,200	1,400	800	1,200	1,400
	Jan	1,855	\$194.01	\$193.64	\$194.70	\$201.75	-0.2%	0.4%	4.0%
	Feb	1,615	\$165.75	\$166.81	\$164.03	\$168.49	%9 .0	-1.0%	1.7%
	Mar	1,454	\$146.80	\$148.81	\$143.45	\$146.18	1.4%	-2.3%	-0.4%
	Apr	1,046	\$98.76	\$103.20	\$97.40	\$97.40	4.5%	-1.4%	-1.4%
	May	824							
	Jun	713							
	Jul	663							
	Aug	069							
	Sep	635							
	Oct	685							
	Nov	1,026	\$96.40	\$100.96	\$95.64	\$95.64	4.7%	%8 ·0 -	%8 .0-
	Dec	1,416	\$142.32	\$144.56	\$138.60	\$140.92	1.6%	-2.6%	-1.0%

¹ Includes current Schedule 34-BPA Credit, ECAM and Customer Efficiency Services Rate Adjustment.

Attachment CAPAI DR 6b
Rocky Mountain Power - State of Idaho
Monthly Billing Comparison - Schedule 1
Non-Low Income Customer Average Monthly Usage
Rate Design A - Same Price Ratio between 1st and 2nd Blocks

			Monthly Billing	Billing 1			Change %	
			kW	kWh Block Scenario	io	kΝ	kWh Block Scenario	rio
Month	kWh	Present	800	1,000	1,200	800	1,000	1,200
Jan	1,109							
Feb	961							
Mar	968							
Apr	735							
May	658	\$80.16	\$81.82	\$83.55	\$84.70	2.1%	4.2%	5.7%
Jun	999	\$80.96	\$82.64	\$84.39	\$85.54	2.1%	4.2%	5.7%
Jul	731	\$89.69	\$90.33	\$92.26	\$93.53	0.7%	2.9%	4.3%
Aug	805	\$100.98	\$99.16	\$101.08	\$102.48	-1.8%	0.1%	1.5%
Sep	902	\$85.87	\$87.42	\$89.28	\$90.50	1.8%	4.0%	5.4%
Oct	641	\$78.22	\$79.84	\$81.53	\$82.64	2.1%	4.2%	2.6%
Nov	292							
Dec	216							

Month kWh Present RWh Block Scenario kWh kWh Jan 1,109 \$106.18 \$109.89 \$105.06 \$106.43 3.5% Feb 961 \$89.90 \$92.82 \$91.72 \$92.91 3.2% Apr 735 \$69.96 \$68.64 \$71.35 \$72.26 -1.9% Jun 665 3.1 4.2 \$72.26 -1.9% Jul 731 4.2 \$71.35 \$72.26 -1.9% Sep 706 \$68.64 \$71.35 \$72.26 -1.9% Oct 645 \$72.87 \$72.26 -1.9% Sep 706 \$68.64 \$71.35 \$72.26 -1.9% Oct 641 \$72.87 \$72.26 -1.9% -1.9% Oct 641 \$72.87 \$74.33 \$75.27 -1.9% Dec 977 \$91.31 \$94.67 \$93.16 \$94.37 3.7%				Monthly Billing	Billing 1			Change %	
kWh Present 800 1,400 84 1,109 \$106.18 \$109.89 \$105.06 \$106.43 961 \$89.90 \$92.82 \$91.72 \$92.91 896 \$84.17 \$85.32 \$85.86 \$86.97 735 \$69.96 \$68.64 \$71.35 \$72.26 658 731 805 805.94 \$72.26 706 706 \$72.87 \$71.49 \$74.33 \$75.27 707 \$91.31 \$94.67 \$93.16 \$94.37				kW	h Block Scenar	.0	kW	kWh Block Scenario	0
1,109 \$106.18 \$109.89 \$105.06 \$106.43 961 \$89.90 \$92.82 \$91.72 \$92.91 896 \$84.17 \$85.32 \$85.97 \$86.97 735 \$69.96 \$68.64 \$71.35 \$72.26 665 731 805 805 805 706 641 \$72.87 \$71.49 \$74.33 \$75.27 768 \$77 \$91.31 \$94.67 \$93.16 \$94.37	Month	kWh	Present	800	1,200	1,400	800	1,200	1,400
961 \$89.90 \$92.82 \$91.72 \$92.91 896 \$84.17 \$85.32 \$85.86 \$86.97 735 \$69.96 \$68.64 \$71.35 \$72.26 665 731 805 706 641 \$71.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Jan	1,109	\$106.18	\$109.89	\$105.06	\$106.43	3.5%	-1.0%	0.2%
896 \$84.17 \$85.32 \$85.86 \$86.97 735 \$69.96 \$68.64 \$71.35 \$72.26 665 731 805 706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Feb	196	889.90	\$92.82	\$91.72	\$92.91	3.2%	2.0%	3.3%
735 \$69.96 \$68.64 \$71.35 \$72.26 658 665 731 805 706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$9467 \$93.16 \$94.37	Mar	968	\$84.17	\$85.32	\$85.86	\$86.97	1.4%	2.0%	3.3%
658 665 731 805 706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Apr	735	96.69\$	\$68.64	\$71.35	\$72.26	-1.9%	2.0%	3.3%
665 731 805 706 641 768 872.87 891.49 874.33 875.27 977 891.31 894.67 893.16 894.37	May	658							
731 805 706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Jun	999							
805 706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Jul	731							
706 641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Aug	805							
641 768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Sep	902							
768 \$72.87 \$71.49 \$74.33 \$75.27 977 \$91.31 \$94.67 \$93.16 \$94.37	Oct	641							
977 \$91.31 \$94.67 \$93.16 \$94.37	Nov	292	\$72.87	\$71.49	\$74.33	\$75.27	-1.9%	2.0%	3.3%
	Dec	716	\$91.31	\$94.67	\$93.16	\$94.37	3.7%	2.0%	3.3%

¹ Includes current Schedule 34-BPA Credit, ECAM and Customer Efficiency Services Rate Adjustment.

Attachment CAPAI DR 6b
Rocky Mountain Power - State of Idaho
Monthly Billing Comparison - Schedule 1
Non-Low Income Customer Average Monthly Usage
Rate Design B - No Price Change to the 1st Block

			Monthly Billing	Billing 1			Change %	
			kΜ	kWh Block Scenario	io oi	kW	kWh Block Scenario	io
Month	kWh	Present	800	1,000	1,200	800	1,000	1,200
Jan	1,109							
Feb	961							
Mar	968							
Apr	735							
May	658	\$80.16	\$80.16	\$80.16	\$80.16	0.0%	0.0%	%0.0
Jun	999	\$80.96	\$80.96	\$80.96	\$80.96	0.0%	%0.0	%0.0
Jul	731	69.68\$	\$88.49	\$88.49	\$88.49	-1.3%	-1.3%	-1.3%
Aug	808	\$100.98	\$97.19	\$96.93	\$96.93	-3.8%	-4.0%	-4.0%
Sep	200	\$85.87	\$85.64	\$85.64	\$85.64	-0.3%	-0.3%	-0.3%
Oct	641	\$78.22	\$78.22	\$78.22	\$78.22	%0.0	%0.0	%0.0
Nov	292							
Dec	214							

			Monthly Billing	Billing 1			Change %	
			kW	kWh Block Scenario	0	kWl	kWh Block Scenario	0
Month	kWh	Present	800	1,200	1,400	800	1,200	1,400
Jan	1,109	\$106.18	\$110.24	\$102.96	\$102.96	3.8%	-3.0%	-3.0%
Feb	961	\$89.90	\$93.69	889.90	\$89.90	4.2%	0.0%	%0.0
Mar	968	\$84.17	\$86.43	\$84.17	\$84.17	2.7%	%0.0	%0.0
Apr	735	\$69.96	96.69\$	\$69.96	\$69.96	%0.0	%0.0	%0.0
May	658				8			
Jun	999							
Jul	731							
Aug	805							
Sep	902							
Oct	641							
Nov	892	\$72.87	\$72.87	\$72.87	\$72.87	%0.0	0.0%	%0.0
Dec	716	\$91.31	\$95.48	\$91.31	\$91.31	4.6%	0.0%	%0.0

¹ Includes current Schedule 34-BPA Credit, ECAM and Customer Efficiency Services Rate Adjustment.

Attachment CAPAI DR 6b ROCKY MOUNTAIN POWER STATE OF IDAHO NORMALIZED BILLING DETERMINANTS HISTORIC 12 MONTHS ENDED DECEMBER 2012

	Units	Present Price Design A	Present Revenue Dollars	Present Price Design B	Present Revenue Dollars
SCHEDULE NO. 1 - Residential Service	ial Service				
Customer Charge	524,225	\$5.00	\$2,621,124	\$5.00	\$2,621,124
All kWh (May - Oct)	187,949,585				
<= 700 kWh	134,704,368	10.7874 ¢	\$14,531,099	10.7874 ¢	\$14,531,099
> 700 kWh	53,245,217	14.5630 ¢	\$7,754,101	14.5630 €	\$7,754,101
$\langle = 800 \text{ kWh}$	147.891.152	11.0339 €	\$16,318,176	10.7874 €	\$15,953,610
> 800 kWh	40,058,433	14.8958 ¢	\$5,967,024		\$6,331,596
$\leq = I,000 kWh$	161,079,681	11.2920 €	\$18,189,098	10.7874 €	\$17,376,310
> I,000 kWh	26,869,904	15.2442 ¢	\$4,096,102	18.2691 ¢	\$4,908,890
4/114 UOC I = 5	169 451 493	11 4622 6	\$19 477 874	10 7874 &	\$18 279 410
11,200 411	601,101,101	1101:11	10,111,111		011,011
> I,200 kWh	18,498,092	15.4739 €	\$2,862,376	21.6552 €	\$4,005,799
All kWh (Nov - Apr)	236,699,857				
<= 1,000 kWh	172,709,452	8.2571 ¢	\$14,260,792	8.2571 ¢	\$14,260,792
> 1,000 kWh	63,990,405	11.1472 €	\$7,133,138	11.1472 ¢	\$7,133,138
$\leq = 800 kWh$	156,560,940	8.0808	\$12,651,415	8.2571 ¢	\$12,927,393
> 800 kWh	80,138,917	10.9092 ¢	\$8,742,515	10.5648 €	\$8,466,516
$\leq = I,200 \text{ kWh}$	188,978,545	8.4427 €	\$15,954,798	8.2571 ¢	\$15,604,147
> 1,200 kWh	47,721,312	11.3977 €	\$5,439,132	12.1325 €	\$5,789,788
<= I,400 kWh	199,176,893	8.5633 ¢	\$17,056,088	8.2571 ¢	\$16,446,235
> 1,400 kWh	37,522,964	11.5605 €	\$4,337,842	13.1858 €	\$4,947,703
Total	424,649,442		\$46,300,254		\$46,300,254